

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Fred Smith, Jr. : No. 19-13290-MDC
Debtor : :

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Debtor, by attorney David M. Offen, has filed a Motion to Modify Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **November 12, 2021**, you or your attorney must do all of the following:

- (a) file an answer explaining your position at:
Office of the Clerk
U.S. Bankruptcy Court
900 Market Street, Suite 400
Philadelphia, Pa. 19107

If you mail your answer to the Bankruptcy Clerks office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the Movant's Attorney
David M. Offen, Esquire
Suite 160 West, The Curtis Center
601 Walnut Street
Philadelphia, Pa. 19106
215-625-9600
Fax 215-625-9734

Kenneth E. West, Esquire
Chapter 13 Standing Trustee
P.O. Box 40837
Philadelphia, PA 19107

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an Order granting the relief requested in the Motion.

3. A hearing on the Motion is scheduled to be held before the Honorable Magdeline M. Coleman, United States Bankruptcy Judge on **December 9, 2021 at 10:00 AM in Courtroom #2**, United States Bankruptcy Court, 900 Market Street, 2nd Floor.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.